



DEPARTMENT OF THE NAVY

NORTHERN DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
10 INDUSTRIAL HIGHWAY
MAIL STOP, #82
LESTER, PA 19113-2030

N60087.AR.000660
NAS BRUNSWICK
5090.3a

5090¹¹¹ REPLY REFER TO
Code 1821/EK

22 JAN 1998

Lepage Environmental Services, Inc.
Ms. Carolyn A. Lepage, C.G.
P.O. Box 1195
Auburn, ME 04211-1195

Subj: RECORD OF DECISION FOR SITES 4, 11 & 13, NAVAL AIR STATION,
BRUNSWICK, ME

Dear Ms. Lepage:

Thank you for your comments on the *Revised Draft Final Record of Decision (ROD) for No Further Action at Sites 4, 11 & 13 and a Remedial Action for the Eastern Plume*. We've provided a response to your comments in Enclosure (1). We will revise the ROD addressing all the comments received and obtain the necessary signatures. Once the ROD is signed we will make the normal distribution. If you have any questions or comments, please contact Mr. James Caruthers at 207-921-2445 or myself at (610) 595-0567, x161.

Sincerely,

EMIL E. KLAWITTER, PE
Remedial Project Manager
By direction of the
Commanding Officer

Copy to (w/encl.):
Mr. R. Lim, EPA Region I
Ms. C. Sait, MEDEP
Mr. J. Caruthers, NAS Brunswick
Mr. P. Nimmer, EA Engineering, Science, and Technology
Mr. J. Brandow, ABB Environmental Services, Inc.
Mr. A. Frazier, Brunswick-Topsham Water District
Mr. T. Fusco, BACSE
Ms. S. Weddle, Brunswick

Lepage Environmental Services, Inc. Comments dated January 5, 1998

1. Concerns have been voiced at a number of RAB and technical meetings about the potential for dense phase liquid (DNAPL) contamination as a result of past activities at Site 11. At the October 10 Restoration Advisory Board meeting, the Navy indicated that they would be performing additional investigations to the Southeast of Site 11. However, with exception of the revisions to pages 14 and 21 that state that the potential for contaminated soils exists and that No Action Decision for Site 11 may be revisited if groundwater monitoring shows contaminated soils are a continuing source of contamination, the rest of the ROD appears to imply the door is closed to further investigation. It would be appropriate to mention the additional investigations the Navy intends to conduct (and the potential impact on the No Action Decision and long term monitoring) in several places in the ROD, such as the descriptions of Site 11 on page 14 and pages 25 through 28, and in sections describing the response action such as pages 3, 21, 42, and 45.

Response: We understand your concern and believe we have addressed additional groundwater investigation in MEDEP's comments. We also refer you to our recent letter of January 8, 1998, which addresses this subject.

2. Page 52. The Navy states that it will pursue the option of discharge of treated water to groundwater in Section IV, Scope and Role of Response Action. How does the costs of this option compare with the costs presented on page 52?

Response: The cost is lower but no definite cost comparison analysis has been done to date. Since modification of the treatment plant may be required, we are waiting for the engineering portion of the infiltration gallery study to be completed before we compare the costs.

3. Page 54. In comment 5 in our August 16 letter, we asked if there had been any revisions to the estimate of 13 to 71 years to attain clean-up goals throughout the plume. The text of the latest version of the ROD has not been revised, but it is unclear to us if that is because the estimated cleanup time is still 13 to 71 years or because our comment was overlooked. Please clarify.

Response: No, we have not revised the estimate to attain clean-up goals.